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9 Attorneys for Plaintiff
MICHELLE GAFFNEY
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11
12 SUPERIOR COURT OF THE STATE OF
CALIFORNIA
13 COUNTY OF SHASTAMICHELLE
GAFFNEY, on behalf of themselves and all
14 others similarly situated and the general
public,

15 Plaintiffs,

16 v.

17 PRIME HEALTHCARE SERVICES –
18 SHASTA, LLC dba SHASTA REGIONAL
MEDICAL CENTER, a Delaware limited
19 liability company; and DOES 1 to 100,

20 Defendant.
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Gaffney Case No. 23CV0202050
Hon. Stephen H. Baker
Dept. 64

**DECLARATION OF ANNA R. SALUSKY IN
SUPPORT OF STIPULATED REQUEST FOR
COURT APPROVAL OF PAGA
SETTLEMENT**

Action filed: December 27, 2022

1 I, Anna R. Salusky, declare:

2 1. I am an attorney duly licensed to practice law before all courts in the State of
3 California. I am the founder of Salusky Law Group. I am co-counsel of record herein and I have
4 personal knowledge of the facts herein. If called as a witness, I could and would competently testify
5 herein.

6 2. This declaration is submitted in support of Plaintiff's Stipulation for Court Approval of
7 Private Attorney's General Act Settlement.

8 **DECLARANT'S ROLE IN LITIGATION & DATA ANALYSIS**

9 3. All Plaintiff's counsel has extensive experience in wage and hour class action litigation.
10 I, along with Janelle Carney – Attorney at Law, APC and Plaintiff, conducted an extensive
11 investigation prior to the Complaint being filed and throughout the litigation. The initial legal work
12 on this matter commenced on or about October 2022.

13 4. The Plaintiff seeks approval of a PAGA settlement in the gross amount of \$800,000.00,
14 on behalf of the State of California and the Aggrieved Employees who are or were employed by
15 Defendant Prime Healthcare Services – Shasta, LLC dba Shasta Regional Medical Center (hereinafter
16 referred to as "Defendant" or "SRMC"). The Aggrieved Employees are ("Aggrieved Employees") are
17 defined as follows: All current and former non-exempt, hourly employees working for Defendant in
18 California at any time between December 12, 2021, to November 1, 2025.

19 5. The Plaintiff propounded formal discovery and requested data from the Defendant
20 including electronic time punch records and payroll records for a randomized 25% sample of
21 aggrieved employees, and relevant company policies. Defendant also provided data points to
22 Plaintiff, including the total number of aggrieved employees and the total number of pay periods
23 worked during the PAGA period. According to Defendant, there are 1,485 Aggrieved Employees
24 who worked a total 61,017 PAGA Pay Periods from December 12, 2021, through June 1, 2025.

25 **EXPERIENCE OF COUNSEL**

26 6. Salusky Law Group specializes in the areas of wage and hour litigation as well as
27 wrongful termination, retaliation and whistleblower claims. I graduated from the University of San
28 Diego School of Law and obtained my Juris Doctor degree in June 2002. I became licensed to
practice law in the state of California in November 2002. Since first obtaining my license, I have

1 continuously remained in good standing as a member of the California Bar. I also took the Nevada Bar
2 examination in 2006 and became licensed to practice law in Nevada that same year. Since first
3 obtaining my license, I have continuously remained in good standing as a member of the Nevada Bar.

4 7. From 2002 through 2016, I worked on the defense side, primarily representing public
5 entities. During that time, I handled the litigation and defense of catastrophic personal injury matters,
6 employment cases and police excessive force claims, including taking multiple cases to trial. My
7 representative clients included the Cities of Newport Beach, Irvine, Tustin, Garden Grove, San Juan
8 Capistrano, Beverly Hills, Torrance, Palm Springs, and Duarte, among others. I also represented
9 Capistrano Unified School District, Orange County Transportation Authority, Regional Center of
10 Orange County, and the San Diego Housing Commission.

11 8. From January 2017 through December 2020, I served as the managing partner at
12 Mahoney Law Group, APC. In my role as the managing partner, I helped grow the caseload from
13 approximately 150 to 500 matters. I also grew the team from 10 to 30 people, half attorneys and half
14 support staff. I managed and supervised all attorneys and support staff, while directing the litigation
15 strategy for approximately 500 cases, the majority of which were employment law matters. My
16 responsibilities included performing regular monthly case reviews on all files with each assigned
17 handling attorney. I estimate that I supervised approximately 150 wage and hour class action lawsuits at
18 any given time. This included managing the litigation strategy, selection of experts, formulation of the
19 trial plan, providing direction regarding key depositions to take, review and approval of Belaire West
20 notices, motions for class certification, motions for preliminary approval, motions for final approval,
21 mediation briefs and settlement agreements. I regularly attended mediations and negotiated settlements.
22 I also took key depositions of the person most qualified and percipient witnesses and defended
23 depositions of our class representatives. I was responsible for training attorneys in our office on how to
24 take an effective deposition, how to prepare our class representative clients for deposition, how to frame
25 the issues and prepare for a successful mediation, and how to gather the necessary evidence to prevail on
26 a motion for class certification.

27 9. In January 2021, I opened my own firm, which focuses on PAGA and wage and hour
28 class action litigation, as well as wrongful termination, retaliation and whistleblower claims. I am
currently handling the litigation strategy for nine (9) wage and hour class action lawsuits. I have co-

1 counsel on 7 of the 9 cases. I recently tried a PAGA action, resulting in a split verdict. Both Plaintiffs
2 and Defendants filed appeals I appeared for oral argument at the Court of Appeal on January 13, 2025.
3 (*Dezan v. Dignity Health,, et al., California Court of Appeal, Fourth Appellate District, Division I, Case*
4 *No. D081552*) After oral argument, the Court issued a ruling granting our appeal in part and denying it
5 in part. The case has been remanded back to the trial court and we are in the process of preparing for
6 class certification. Like most, if not all class actions, this case required voluminous evidence to prove
7 damages as well as extensive expert testimony and additional discovery.

8 10. I recently litigated a wage and hour class action lawsuit entitled *Gomez v. Children's*
9 *Institute, Inc.*, filed in Los Angeles Superior Court, Case No. 21STCV35411, along with companion
10 case *Gallegos v. Children's Institute, Inc.*, Case No. 21STCCV19276, which settled for \$1.85 million.
11 The issues included allegations that the employer failed to reimburse class members for work done off-
12 the-clock, non-compliant meal and rest breaks, failure to reimburse for necessary business expenses,
13 wage statement violations, and penalties. On or around May 10, 2023, the court granted preliminary
14 approval of the settlement. The motion was granted on the first attempt. In late 2023, the court granted
15 final approval. The case funded and is now dismissed.

16 11. I recently litigated a wage and hour class action lawsuit entitled *Garcia v. Wal-Mart*
17 *Stores, Inc.*, filed in United States District Court, Central District of California, Case No. 5:16-cv-01645
18 TJH (RAOx), which settled for \$2.25 million. The case is currently pending final approval. My office,
19 together with Janelle Carney, Attorney at Law, APC, the Law Office of Joseph Antonelli, Law Offices
20 of Kevin T. Barnes, and Law Offices of Raphael A. Katri litigated this case and maintained the best
21 interests of the class members in ultimately settling the matter. The parties were prepared to try the case
22 on May 30, 2023. On or around September 8, 2022, my firm associated into the case for the purpose of
23 serving as co-counsel at trial. Subsequently, while preparing the case for trial, Defendant agreed to
24 attempt one more mediation with Judge West on May 10, 2023, which resulted in a settlement. The
25 Final Approval Motion was filed and we are awaiting a ruling from the court.

26 12. In 2025, I obtained final approval in a class action lawsuit entitled *Reyes v. Dinsmore*
27 *Enterprises, Inc., et al.*, filed in Santa Clara County Superior Court, Case No. 21CV386800, which
28 settled for \$460,000. My office litigated this case and maintained the best interests of the class members
in ultimately settling the matter.

1 13. In 2025, I obtained final approval in a class action lawsuit entitled *Vargas v. Master*
2 *Landscape & Maintenance, Inc.*, filed in Orange County Superior Court, Case No. 30-2021-01222960-
3 CU-OE-CXC. My office litigated this case and maintained the best interests of the class members in
4 ultimately settling the matter.

5 14. In 2025, I obtained preliminary approval in a class action lawsuit entitled *Villalpando v.*
6 *South Corona Auto Spa, LP*, filed in Riverside County Superior Court, Case No. CVRI2200998. The
7 hearing on the motion for final approval is pending. My office litigated this case and maintained the
8 best interests of the class members in ultimately settling the matter.

9 **ATTORNEYS' FEES AND COSTS**

10 15. My firm made every effort to litigate this action in an efficient and cost-effective manner.
11 Following my review of the case file and hours and discussions with counsel, my firm has spent
12 approximately 50 hours on this matter for an unadjusted loadstar of \$40,192.

13 16. My firm's costs are approximately \$2,576.03 (A true and correct copy of Salusky Law
14 Group's detailed costs billing is attached hereto as **Exhibit 1**). The costs incurred as reflected in **Exhibit**
15 **1** consist of mediation fees and travel expenses related to meeting with and interviewing witnesses
16 incurred and paid by Salusky Law Group. I have reviewed Salusky Law Group's costs, and each
17 itemized entry as reflected in **Exhibit 1** and I believe that each cost is reasonable and necessary in the
18 prosecution of this action. The attorneys' costs were a result of investigation, research, litigation,
19 mediation, and other related matters to the prosecution of this case, as evidenced by the cost bill attached
20 as **Exhibit 1**. All of the costs are actual checks written or "hard" costs. The "hard" costs represent
21 checks written by declarant's office to prosecute this matter. That is, before any reimbursement from
22 any person, Salusky Law Group had incurred \$2,576.03 in costs. The bills have a summary of costs as
23 its last page. All "hard" costs on the attached bill represents costs that Salusky Law Group incurred and
24 paid. Salusky Law Group does not include any interest, markup or any premium amount on the costs
25 actually incurred and paid.

26 17. I personally have reviewed each time entry in Salusky Law Group's billing for accuracy
27 and believe to the best of my ability that each entry accurately reflects the description of work
28 performed, the date the work was done and the attorney billing for said work. A true and correct copy
of my firm's hourly billing is attached hereto as **Exhibit 2**.

1 18. I anticipate that I will incur up to another 10-15 hours, to ensure the settlement receives
2 approval, and comply with the filing of post hearing filings once the settlement is distributed to the
3 aggrieved employees as well as answer any questions any Aggrieved Employee may have.

4 19. As set forth above, I participated extensively in the investigation, informal discovery, and
5 mediation. I am very familiar with the contingent fee market throughout California, particularly as it
6 pertains to complex employment, wage and hour, and class action litigation. On behalf of Salusky Law
7 Group, I have negotiated numerous contingency fee agreements with plaintiffs both as individuals and
8 as representatives in class action suits. Many of those agreements provide that counsel will receive a fee
9 that is between 30%-45% of any recovery that is obtained, and, in addition, that counsel be reimbursed
10 for the costs they incurred out of a recovery amount. The individual Plaintiff signed a contingency fee
11 agreement that compensating counsel up to 35% of any gross settlement. My regular hourly fee of \$850
12 in complex litigation is reasonable. Counsel for Plaintiff are experienced employment lawyers and have
13 extensive experience in the specific sub-category of wage and hour claims.

14 20. Salusky Law Group is co-counsel with Janell Carney-Attorney at Law, APC, Schneider
15 Wallace Cottrell Kim LLP, and Lavi & Ebrahimian LLP. There is an agreement to split the attorneys'
16 fees recovered in this Action. My client has approved the aforementioned fee-splitting agreement in
17 writing.

18 21. These are typical and standard rates in employment related contingency agreements in the
19 Los Angeles, Riverside, San Bernardino, Orange County, San Diego, and throughout California.
20 Indeed, in my opinion, the Plaintiff in this complex wage and hour PAGA and class action case could
21 not have retained competent counsel in California, particularly with the considerable skill and expertise
22 of my firm for any amount significantly less than the contingency fee percentage provided in these
23 retainer agreements. Plaintiff's Counsel has advanced all costs and taken on a substantial risk without
24 the guarantee of a payout.

25 I declare under penalty of perjury under the laws of the State of California that the foregoing is
26 true and correct.

27 Executed at Long Beach, California on this 5th day of December 2025.

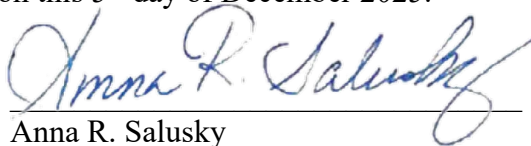
28 
Anna R. Salusky

EXHIBIT 1

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Draft/revise CONTINUE WORKING ON DECLARATION IN SUPPORT OF MOTION FOR APPROVAL OF PAGA SETTLEMENT.	BILLABLE	12/4/2025	1.8	\$850.00	\$1,530.00	Anna R. Salusky
Communicate (other outside counsel) MULTIPLE EMAILS TO AND FROM CO-COUNSEL RE APPROVAL OF PAGA SETTLEMENT.	BILLABLE	12/3/2025	0.3	\$850.00	\$255.00	Anna R. Salusky
Draft/revise WORK ON DECLARATION IN SUPPORT OF MOTION FOR PRELIMINARY APPROVAL.	BILLABLE	12/2/2025	1.4	\$850.00	\$1,190.00	Anna R. Salusky
Communicate (other outside counsel) MULTIPLE EMAILS TO AND FROM CO-COUNSEL RE APPROVAL OF PAGA SETTLEMENT.	BILLABLE	12/2/2025	0.4	\$850.00	\$340.00	Anna R. Salusky
Communicate (other outside counsel) MULTIPLE EMAILS TO AND FROM J. CARNEY RE DECLARATION, APPROVAL MOTION.	BILLABLE	11/25/2025	0.3	\$850.00	\$255.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other outside counsel) MULTIPLE EMAILS TO AND FROM CO-COUNSEL RE PAGA PERIODS, FURTHER STATUS CONFERENCE.	BILLABLE	11/25/2025	0.3	\$850.00	\$255.00	Anna R. Salusky
Communicate (other external) REVIEW NOTICE OF RULING.	BILLABLE	11/24/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM N. PILLER, J. CARNEY, P. EBSWORTH RE SETTLEMENT.	BILLABLE	10/31/2025	0.3	\$850.00	\$255.00	Anna R. Salusky
Communicate (other outside counsel) REVIEW EMAIL FROM J. CARNEY RE PROPOSED ORDER AND STIPULATION TO APPROVE PAGA SETTLEMENT.	BILLABLE	10/30/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM N. PILLER, J. CARNEY, P. EBSWORTH RE SETTLEMENT.	BILLABLE	10/23/2025	0.2	\$850.00	\$170.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) EMAILS TO AND FROM N. PILLER, J. CARNEY, P. EBSWORTH RE SETTLEMENT.	BILLABLE	10/22/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM N. PILLER,, J. CARNEY, P. EBSWORTH RE SETTLEMENT TERMS, REDLINE TO AGREEMENT.	BILLABLE	10/21/2025	0.3	\$850.00	\$255.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM N. PILLER, J. CARNEY, P. EBSWORTH RE SETTLEMENT TERMS.	BILLABLE	10/15/2025	0.3	\$850.00	\$255.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM C. LE, N. PILLER, S. SLOANE, J. CARNEY RE COSTS, SETTLEMENT TERMS.	BILLABLE	10/14/2025	0.3	\$850.00	\$255.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM C. LE, N. PILLER, S. SLOANE, J. CARNEY RE SETTLEMENT TERMS, FEE SPLIT, SERVICE AWARDS.	BILLABLE	10/7/2025	0.3	\$850.00	\$255.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other outside counsel) EMAILS TO AND FROM J. CARNEY RE COSTS.	BILLABLE	10/6/2025	0.1	\$850.00	\$85.00	Anna R. Salusky
Draft/revise PREPARE COST REPORT.	BILLABLE	10/6/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM C. LE, N. PILLER, S. SLOANE, J. CARNEY RE COSTS, REDLINES TO SETTLEMENT AGREEMENT.	BILLABLE	10/6/2025	0.5	\$850.00	\$425.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM C. LE, N. PILLER, S. SLOANE, J. CARNEY RE COSTS, REDLINES TO SETTLEMENT AGREEMENT.	BILLABLE	10/3/2025	0.3	\$850.00	\$255.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM P. EBSWORTH AND CO-COUNSEL RE SETTLEMENT DRAFT.	BILLABLE	9/19/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM CO-COUNSEL RE SETTLEMENT.	BILLABLE	9/18/2025	0.3	\$850.00	\$255.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) CONFER WITH J. CARNEY RE STATUS.	BILLABLE	9/8/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other external) EMAIL OPPOSING COUNSEL RE STATUS OF SETTLEMENT AGREEMENT.	BILLABLE	9/3/2025	0.1	\$850.00	\$85.00	Anna R. Salusky
Communicate (with client) MULTIPLE CALLS WITH M. GAFFNEY RE STATUS OF MATTER, MEDIATOR'S PROPOSAL, SETTLEMENT.	BILLABLE	8/15/2025	0.6	\$850.00	\$510.00	Anna R. Salusky
Draft/revise UPDATE CASE PLAN.	BILLABLE	8/15/2025	0.3	\$850.00	\$255.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM MEDIATOR T. ORTMAN RE MEDIATOR'S PROPOSAL.	BILLABLE	8/15/2025	0.4	\$850.00	\$340.00	Anna R. Salusky
Communicate (other outside counsel) CONFER WITH J. CARNEY RE MEDIATOR'S PROPOSAL.	BILLABLE	8/14/2025	0.2	\$850.00	\$170.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) ZOOM MEETING WITH MEDIATOR AND CO-COUNSEL RE SETTLEMENT.	BILLABLE	8/11/2025	0.6	\$850.00	\$510.00	Anna R. Salusky
Communicate (other outside counsel) EMAILS TO AND FROM J. CARNEY RE SETTLEMENT.	BILLABLE	8/8/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other outside counsel) CONFER WITH J. CARNEY RE MRS. GAFFNEY'S DAMAGES.	BILLABLE	8/7/2025	0.3	\$850.00	\$255.00	Anna R. Salusky
Communicate (with client) CALL WITH M. GAFFNEY RE STATUS.	BILLABLE	8/4/2025	0.3	\$850.00	\$255.00	Anna R. Salusky
Communicate (other external) CONFER WITH COCOUNSEL REGARDING COMMUNICATIONS WITH MEDIATOR RE BRACKET.	BILLABLE	8/1/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other outside counsel) EMAILS TO AND FROM N. PILLER RE MEDIATION.	BILLABLE	7/28/2025	0.2	\$850.00	\$170.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) ZOOM CONFERENCE WITH MEDIATOR AND PLAINTIFFS' COUNSEL RE SETTLEMENT.	BILLABLE	7/25/2025	0.6	\$850.00	\$510.00	Anna R. Salusky
Communicate (other outside counsel) CONFER WITH J. CARNEY RE SETTLEMENT STRATEGY AND NEXT STEPS.	BILLABLE	7/25/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other outside counsel) CONFER WITH COCOUNSEL RE SETTING UP ZOOM MEETING.	BILLABLE	7/24/2025	0.1	\$850.00	\$85.00	Anna R. Salusky
Review/analyze REVIEW TELEPHONIC QUESTIONNAIRE AND CONFER WITH J. CARNEY RE SAME.	BILLABLE	7/21/2025	0.6	\$850.00	\$510.00	Anna R. Salusky
Communicate (other external) EMAIL M. GAFFNEY RE UPCOMING MEDIATION.	BILLABLE	7/17/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other outside counsel) CONFER WITH J. CARNEY RE UPCOMING STATUS CONFERENCE.	BILLABLE	6/6/2025	0.1	\$850.00	\$85.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) EMAIL AND CALL T. ORTMAN RE MEDIATION.	BILLABLE	6/5/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other outside counsel) MULTIPLE EMAILS WITH CO-COUNSEL RE MEDIATION.	BILLABLE	6/5/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other outside counsel) MULTIPLE EMAIL COMMUNICATIONS WITH CO-COUNSEL RE MEDIATION.	BILLABLE	5/28/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (with client) EMAILS TO AND FROM M. GAFFNEY RE OBTAINING RETIREMENT ACCOUNT STATEMENTS.	BILLABLE	5/28/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Review/analyze FINISH POWER POINT PRESENTATION.	BILLABLE	5/16/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other external) INTERVIEW WITH S. CLARK RE EXPERIENCES WORKING AT THE HOSPITAL.	BILLABLE	5/16/2025	0.8	\$850.00	\$680.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Appear for/attend ATTEND MEETING WITH POTENTIAL AGGRIEVED EMPLOYEES AND CLASS MEMBERS. CONDUCT WITNESS INTERVIEWS.	BILLABLE	5/16/2025	6.5	\$850.00	\$5,525.00	Anna R. Salusky
Appear for/attend TRAVEL TO REDDING FROM LONG BEACH FOR MEETING WITH POTENTIAL CLASS MEMBERS AND AGGRIEVED EMPLOYEES.	BILLABLE	5/15/2025	7.5	\$850.00	\$6,375.00	Anna R. Salusky
Draft/revise WORK ON POWER POINT PRESENTATION FOR MEETING WITH POTENTIAL AGGRIEVED EMPLOYEES.	BILLABLE	5/14/2025	1.9	\$850.00	\$1,615.00	Anna R. Salusky
Review/analyze WORK ON JOINT PROCSECUTION AGREEMENT AND FEE SPLIT DISCLOSURE.	BILLABLE	4/29/2025	0.4	\$850.00	\$340.00	Anna R. Salusky
Communicate (other external) MULTIPLE COMMUNICATIONS BY PHONE AND EMAIL WITH SIERRA DANK AT SHERATON RE SETTING UP DETAILS FOR PRESENTATION WITH UNION.	BILLABLE	4/25/2025	0.6	\$850.00	\$510.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) TEAMS MEETING WITH CO-COUNSEL RE STRATEGY MOVING FORWARD.	BILLABLE	3/12/2025	0.3	\$850.00	\$255.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM J. LAVI AND J. VARUGHESE RE STATUS.	BILLABLE	3/7/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other outside counsel) EMAILS TO AND FROM N. PILLER RE COORDINATION, NEXT STEPS.	BILLABLE	2/25/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Settlement ATTEND MEDIATION.	BILLABLE	2/21/2025	6.5	\$850.00	\$5,525.00	Anna R. Salusky
Communicate (other outside counsel) CONFER WITH J. CARNEY RE NEXT STEPS.	BILLABLE	2/21/2025	0.2	\$850.00	\$170.00	Anna R. Salusky
Settlement WORK ON MEDIATION BRIEF.	BILLABLE	2/11/2025	0.5	\$850.00	\$425.00	Anna R. Salusky
Communicate (other outside counsel) EMAILS TO AND FROM J. CARNEY AND TEAM RE MEDIATION BRIEF.	BILLABLE	2/11/2025	0.2	\$850.00	\$170.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other outside counsel) CALL WITH CO-COUNSEL RE UPCOMING MEDIATION.	BILLABLE	1/29/2025	0.3	\$850.00	\$255.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM P. EBSWORTH AND J. CARNEY RE DOCUMENTS NEEDED FOR MEDIATION.	BILLABLE	12/23/2024	0.2	\$850.00	\$170.00	Anna R. Salusky
Review/analyze REVIEW STIPULATION TO CONTINUE STATUS CONFERENCE PENDING MEDIATION.	BILLABLE	11/15/2024	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other external) REVIEW LETTER TO OPPOSING COUNSEL RE DOCUMENTS NEEDED FOR MEDAITION.	BILLABLE	10/23/2024	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (with client) EMAIL TO CLIENT RE STATUS.	BILLABLE	8/6/2024	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM J. KONECKY RE MEDIATION.	BILLABLE	7/23/2024	0.2	\$850.00	\$170.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) MULTIPLE EMAILS WITH J. KONECKY, A. ADAMIAN, W. TRAN, V. GRANBERRY, J. LAVI, J. PILLER AND J. CARNEY RE PEITION FOR COORDINATION.	BILLABLE	7/4/2024	0.2	\$850.00	\$170.00	Anna R. Salusky
Communicate (other outside counsel) TEAMS MEETING WITH J. CARNEY, J. KONECKY, A. ADAMIAN, N. PILLER RE MOTION FOR COORDINATION	BILLABLE	6/7/2024	0.4	\$750.00	\$300.00	Anna R. Salusky
Manage data/files ADD ARS SIGNANATURE TO JPA; EMAIL ARS/JC	BILLABLE	5/14/2024	0.1	\$175.00	\$17.50	Jerin Wilkinson
Communicate (other outside counsel) CONFER WITH J. WILKINSON AND W. TRAN RE FEE SPLIT FOR JPA.	BILLABLE	4/30/2024	0.2	\$750.00	\$150.00	Anna R. Salusky
Court Mandated Conferences REVIEW STIPULATION AND PROPOSED ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE.	BILLABLE	4/15/2024	0.2	\$750.00	\$150.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Time TEAMS MEETING TO DISCUSS JPA.	BILLABLE	4/10/2024	0.4	\$750.00	\$300.00	Anna R. Salusky
Communicate (other external) EMAIL J. CARNEY RE NOTES FROM TEAMS MEETING.	BILLABLE	4/10/2024	0.2	\$750.00	\$150.00	Anna R. Salusky
Communicate (other external) EMAILS TO AND FROM D. HORTON RE SCHEDULING CONFERENCE CALL WITH JAMS.	BILLABLE	3/7/2024	0.2	\$750.00	\$150.00	Anna R. Salusky
Review/analyze REVIEW PRE-ARBITRATION AND ARBITRATION DATES.	BILLABLE	1/23/2024	0.2	\$750.00	\$150.00	Anna R. Salusky
Communicate (other outside counsel) EMAILS TO AND FROM J. CARNEY RE UPCOMING STATUS CONFERENCE.	BILLABLE	1/18/2024	0.2	\$750.00	\$150.00	Anna R. Salusky
Communicate (in firm) EMAILS TO AND FROM J. WILKINSON RE STAY IN CASE, STATUS OF HEARING.	BILLABLE	1/18/2024	0.2	\$750.00	\$150.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Communicate (other external) CALL WITH J. CARNEY AND OPPOSING COUNSEL RE SCHEDUING ORDER.	BILLABLE	1/8/2024	0.2	\$750.00	\$150.00	Anna R. Salusky
Draft/revise UPDATE CASE PLAN.	BILLABLE	1/8/2024	0.2	\$750.00	\$150.00	Anna R. Salusky
Review/analyze REVIEW SIGNED STIPULATION TO CONTINUE SETTLEMENT CONFERENCE AND TRIAL DATES.	BILLABLE	1/8/2024	0.2	\$750.00	\$150.00	Anna R. Salusky
Manage data/files DOWNLOAD AND SAVE APPOINTMENT OF ARBITRATOR ON NETWORK	BILLABLE	11/1/2023	0.2	\$175.00	\$35.00	Jerin Wilkinson
Communicate (other outside counsel) CONFER WITH J. CARNEY RE ARBITRATION.	BILLABLE	9/21/2023	0.2	\$750.00	\$150.00	Anna R. Salusky
Review/analyze REVIEW LETTER FROM J. CARNEY RE OUTCOME OF HEARING AND DEMAND FOR ARBITRATION.	BILLABLE	8/21/2023	0.2	\$750.00	\$150.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Dispositive Motions WORK ON OPPOSITION TO MOTION TO COMPEL ARBITRATION.	BILLABLE	8/8/2023	0.6	\$750.00	\$450.00	Anna R. Salusky
Pleading REVIEW NOTICE OF DISMISSAL OF DEFENDANT.	BILLABLE	8/7/2023	0.2	\$750.00	\$150.00	Anna R. Salusky
Communicate (other outside counsel) EMAILS TO AND FROM J. LABI RE FEE SHARING AGREEMENT AND STRATEGY MOVING FORWARD.	BILLABLE	7/13/2023	0.3	\$750.00	\$225.00	Anna R. Salusky
Communicate (other external) CALL WITH J. LAVI AND J. CARNEY RE JPA AND FEE SPLIT.	BILLABLE	7/10/2023	0.2	\$750.00	\$150.00	Anna R. Salusky
Manage data/files DOWNLOAD AND SAVE DEF. MOTION TO COMPEL ARBITRATION ON NETWORK; CALENDAR HEARING DATE AND DEADLINES FOR OPPO AND REPLY	BILLABLE	6/27/2023	0.4	\$175.00	\$70.00	Jerin Wilkinson
Manage data/files EMAIL CORRESPONDENCE WITH ARS/JC; MARK CMC AS VACATED IN PANTHER; REVIEW FILES FOR NEW DATES	BILLABLE	5/23/2023	0.4	\$175.00	\$70.00	Jerin Wilkinson

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files CALENDAR SETTLEMENT CONFERENCE AND TRIAL DATE IN PANTHER; ADD COURT/JUDGE INFO TO PANTHER FILE; APPLY WORKFLOW FOR PRE-TRIAL DEADLINES	BILLABLE	5/23/2023	0.4	\$175.00	\$70.00	Jerin Wilkinson
Research RESEARCH RE JUDGE P. LUCAS.	BILLABLE	1/12/2023	0.3	\$750.00	\$225.00	Anna R. Salusky
Communicate (other outside counsel) CONFER WITH J. CARNEY RE PEREMPTORY CHALLENGE.	BILLABLE	1/12/2023	0.2	\$750.00	\$150.00	Anna R. Salusky
Manage data/files SAVE NOTICE OF CASE REASSIGNMENT; UPDATE PANTHER FILE; CALENDAR INITIAL CMC AND CMC STATEMENT DEADLINE; SAVE DOCS FROM JCAL	BILLABLE	1/3/2023	0.9	\$175.00	\$157.50	Jerin Wilkinson
Manage data/files DOWNLOAD AND SAVE PAGA NOTICE ON NETWORK; CALENDAR DEADLINE FOR LWDA TO RESPOND	BILLABLE	12/13/2022	0.1	\$175.00	\$17.50	Jerin Wilkinson
Draft/revise UPDATE CASE PLAN.	BILLABLE	11/22/2022	0.2	\$750.00	\$150.00	Anna R. Salusky

ITEM	STATUS	DATE	HRS.	RATE	TOTAL	BILLED BY
Manage data/files OPEN PANTHER FILE; OPEN NETWORK FILE; SAVE DOCS FROM JANELLE CARNEY FILES ON NETWORK	BILLABLE	11/8/2022	0.4	\$175.00	\$70.00	Jerin Wilkinson
			50.20	\$40,192.50 USD		

EXHIBIT 2

EXPENSE	STATUS	DATE	PRICE	TOTAL	QTY	BILLED BY
Out-of-town travel AVIS car rental - out of town travel	BILLABLE	5/17/2025	\$526.97	\$526.97	1	Anna R. Salusky
Out-of-town travel Air Fare - roundtrip to and from Sacramento	BILLABLE	4/23/2025	\$260.26	\$260.26	1	Silvia Pacheco
Out-of-town travel Hotel	BILLABLE	4/23/2025	\$663.80	\$663.80	1	Silvia Pacheco
Arbitrators/mediators Ortman Mediation - Mediation Fee	BILLABLE	1/9/2025	\$1,125.00	\$1,125.00	1	Silvia Pacheco
				\$2,576.03 USD		